



**General Aviation
Manufacturers Association**

1400 K Street NW, Suite 801
Washington, DC 20005-2485
(202) 393-1500 • Fax (202) 842-4063

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Docket Management System
U.S. Department of Transportation
Room Plaza 401
400 Seventh Street, SW.
Washington, DC 20590-0001

**Subject: Docket Number FAA-2004-19411; GAMA Comments on SFAR-105
Proposed Reservation System for Unscheduled Arrivals at Chicago's O'Hare
International Airport**

The General Aviation Manufacturers Association (GAMA) is an international trade association representing over 50 manufacturers of fixed-wing airplanes, engines, avionics and components. In addition, GAMA member companies also operate aircraft fleets, airport fixed based operations, and pilot and maintenance technician training facilities across the nation. GAMA submits the following comments in response to FAA's Notice of Proposed Rulemaking (NPRM)—*SFAR-105: Proposed Reservation System for Unscheduled Arrivals at Chicago's O'Hare International Airport*, published in the Federal Register (69 FR 202) October 20, 2004.

The NPRM proposes a reservation system for non-scheduled arrivals at O'Hare International Airport (ORD) as a means of managing an overall capacity problem at the airport having a broad impact on the overall National Airspace System. GAMA believes that ORD presents a unique situation where other delay remedies have been exhausted. Therefore, a system that properly balances both scheduled and non-scheduled operations at ORD needs to be developed.

GAMA's GENERAL COMMENTS REGARDING THE RESERVATION SYSTEM

- A slot system, such as the one proposed by this NPRM, should not be considered a generic delay-reduction solution for any airport until all other remedies have been exhausted; including anti-trust exemptions to allow schedule coordination between airlines.
- If the FAA decides to introduce a slot system such as the one proposed in this rule the Department of Transportation should re-evaluate and re-justify that slot reservation system with a certain frequency. GAMA proposes that this re-evaluation and re-justification of the slot system should take place at least every two years.

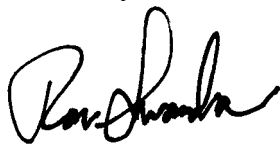


- Additionally, the SFAR should recognize that slots are the property of the U.S. Government and should not be considered the property of any other entity. For these reasons, the slots cannot be bought or sold.
- The reservation system for non-scheduled operations is properly defined as an arrival only system; that is, the 4 arrival reservations per hour do not influence the number of departures that ORD can handle for non-scheduled operations. GAMA believes that the NPRM is properly structured this way, but takes this opportunity to recognize that the proposed rule does not and should not influence departure operations by non-scheduled airplanes.
- GAMA would note that the reservation system for non-scheduled operations is a strategic planning tool only. As the NPRM recognizes in Section 5.d. "A reservation does not ensure against traffic delays nor does it guarantee arrival within such allotted time. [...] Aircraft specifically delayed by ATC traffic management initiatives are not required to obtain a new reservation based on the revised arrival time." GAMA believes that it is critical that aircraft that experience normal delay activity such as weather, re-routing, etc. similarly are not required to obtain a new reservation, but will be properly accommodated on their arrival at the airport in spite of their delayed arrival and potentially placing the number of non-scheduled arrivals at the airport above the 4 per hour cap. Additionally:
 - o Once airborne air traffic control should accommodate aircraft with arrival slots on a first-come, first served basis.
 - o VFR flights (pop-ups) should be accommodated as space is available in real-time, not requiring going through the non-scheduled reservation system.
 - o If the weather or other factors permit, the 4 airplanes per hour cap should not limit the number of operations into the airport. GAMA believes that the rule properly recognizes this as written.
- All operations of scheduled airlines should require use of one of the airline's slots as opposed to one of the 4 slots allocated to non-scheduled airplanes between 07:00 a.m. and 08:59 p.m. When the airline has to conduct a non-revenue flight, including a maintenance ferry flight, repositioning flight or other non-scheduled operation, these operations should take place outside the 07:00 a.m. through 08:59 pm time window, so as to permit non-schedule, non-airline operations to use the 4 slots per hour allocated to them.
- Additionally, at least two hours before scheduled arrival time, scheduled operators should surrender any slots that will not be used in a manner similar to the process outlined for non-scheduled operators in Section 5.j. These slots should immediately be made available to non-scheduled operators on a first-come, first served basis in accordance with the process outlined in Section 5.
- The four per hour arrival slots should not be applied to rotorcraft operations.

- Arrival slots should not be applied to any runway less than 5,000 feet in length that does not intersect another runway greater than 5,000 feet in length.
- Finally, any introduction of a slot system, should trigger the following actions:
 - o The Department of Transportation, the Federal Aviation Administration and local airport authorities should develop a plan to increase capacity – including new runways and new airports – and provide priority funding for projects that expand capacity at the affected airport.
 - o Where feasible, air traffic should develop independent arrival routes for smaller/slower aircraft.

GAMA appreciates the opportunity to comment on this important NPRM. Please feel free to contact me at rswanda@gama.aero or (202) 393-1500 if there are any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron Swanda", written in a cursive style.

Ron Swanda
Interim President